

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Civil Action No. 20-CV-4647
v.)	(NGG) (CLP)
)	
VILLAGE REALTY OF STATEN)	
ISLAND LTD. and DENIS DONOVAN,)	
)	
Defendants.)	
_____)	

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff, United States of America, and Defendants, Village Realty of Staten Island Ltd. and Denis Donovan, hereby submit this joint stipulation of dismissal with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Paragraph 49 of the Consent Decree and Judgment entered by this Court on April 5, 2021 (ECF No. 14). In support, the parties state as follows:

1. On April 5, 2021, the Court entered the Consent Decree and Judgment, which resolved the claims alleged in the United States' Complaint. ECF No. 14.
2. Paragraph 49 of the Consent Decree and Judgment provides that it shall remain in effect for a period of two (2) years from the date of its entry. Thus, by its terms, the Consent Decree and Judgment expired on April 5, 2023.
3. Paragraph 49 of the Consent Decree and Judgment further provides that the Court shall retain jurisdiction for the duration of the Consent Decree, for the purpose of enforcing the Consent Decree, after which time the case shall be dismissed with prejudice.

4. Accordingly, the parties request that this case be dismissed with prejudice, with each party to bear its own costs, fees and disbursements.

Dated: April 20, 2023

Respectfully submitted,

For Plaintiff United States of America:

BREON PEACE
United States Attorney
Eastern District of New York

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

/s/ Rachel G. Balaban
RACHEL G. BALABAN
Assistant United States Attorney
271 Cadman Plaza East
Brooklyn, New York 11201
Phone: 718-254-6028
Fax: 718-254-6081
E-mail: rachel.balaban@usdoj.gov

SAMEENA SHINA MAJEED
Chief

/s/ Katherine A. Raimondo
R. TAMAR HAGLER
Deputy Chief
KATHERINE A. RAIMONDO
Trial Attorney
Housing and Civil Enforcement Section
Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street, NE, 8th Floor
Washington, DC 20530
Phone: (202) 305-1987
Fax: (202) 514-1116
Katherine.Raimondo@usdoj.gov

Attorneys for Plaintiff
United States of America

For All Defendants:

/s/ Amy M. Monahan
AMY M. MONAHAN
L'Abbate, Balkan, Colavita & Contini L.L.P.
3 Huntington Quadrangle, Suite 102S
Melville, New York 11747
Tel: (516) 837-7385
amonahan@lbcclaw.com

So Ordered.

s/Nicholas G. Garaufis

Hon. Nicholas G. Garaufis

Date: 4/21/23